

1 BARRETT S. LITT, SBN 45527  
Email: blitt@kmbllaw.com  
2 RONALD O. KAYE, SBN 145051  
Email: rok@kmbllaw.com  
3 KEVIN J. LaHUE, SBN 237556  
Email: klahue@kmbllaw.com  
4 KAYE, McLANE, BEDNARSKI & LITT, LLP  
975 East Green Street  
5 Pasadena, California 91106  
Tel: (626) 844-7660  
6 Fax: (626) 844-7670

7 Attorneys For Plaintiff ANDREW WILSON

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10

11 ANDREW WILSON,

12 Plaintiff,

13 v.  
14

15 CITY OF LOS ANGELES; COUNTY OF  
16 LOS ANGELES; RICHARD MARKS;  
17 AND DOES 1-10, INCLUSIVE.

18 Defendants.  
19

Case No: 2:18-CV-05775-KS

[Hon. Karen L. Stevenson]

**[PROPOSED] ORDER REGARDING  
STIPULATION FOR PROTECTIVE  
ORDER RE RECORDS TO BE  
PRODUCED BY THE CALIFORNIA  
DEPARTMENT OF CORRECTIONS  
AND REHABILITATION**

20 Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and based on  
21 the parties' Stipulation for Protective Order ("Stipulation") filed on April 17, 2019,  
22 the terms of the protective order to which the parties have agreed are adopted as a  
23 protective order of this Court except to the extent, as set forth below, that those  
24 terms have been modified by the Court's amendment of the preamble and  
25 paragraph 8 of the Stipulation.

26 //

27 //

28 //

**AGREED TERMS OF THE PROTECTIVE ORDER AS ADOPTED AND  
MODIFIED BY THE COURT<sup>1</sup>**

The Court, having received, read, and considered the Stipulation of the Parties and good cause showing therefrom, adopts the Stipulation of the Parties ~~in its entirety~~ **with changes** as its Order. The Court finds:

1. The only documents and materials to be produced are those requested in the Subpoena Duces Tecum dated February 26, 2019 and served on or around March 4, 2019, which requests the central file documents for Vincent G. Sanders (D.O.B. 6/17/62) beginning in 1975 through current.

2. No documents or images shall be shown, disclosed, displayed, disseminated, or communicated either directly or indirectly to any person or used in any fashion by any party to this action except as may be directly necessary and utilized by counsel, counsel's experts, and/or investigators in the preparation of the defense or prosecution of this action. Any documents produced pursuant to this Protective Order or reference to the contents thereof shall be kept confidential and under seal unless and until allowed by further order of a competent court and only after having provided CDCR reasonable notice of the intent to disclose and afforded a reasonable opportunity to the CDCR to object and/or be heard.

3. Any documents produced pursuant to the Protective Order shall be used solely in connection with the preparation of the defense or prosecution in the UNITED STATES DISTRICT COURT, CENTRAL DISTRICT case of ANDREW WILSON V. CITY OF LOS ANGELES, RICHARD MARKS CASE NO. 2: 18-CV-05775-KS, including associated appellate proceedings and collateral review.

4. All parties, with exception to Los Angeles County Counsel, in this matter are personally prohibited from reviewing the discovered materials except in the direct

---

<sup>1</sup> The Court's additions to the agreed terms of the Protective Order are generally indicated in bold typeface, and the Court's deletions are indicated by lines through the text being deleted.

1 presence and under the direct supervision of their counsel, investigator, or expert witness  
2 as may be necessary for the purposes of assisting in the preparation of this case. Under  
3 no circumstances shall the parties personally be given any of the materials or copies of  
4 the materials for him to retain in his possession.

5 5. This Protective Order shall be applicable to all Parties, any attorney for the  
6 Parties, and any investigator, expert witness, agent, or representative of the Parties.

7 6. A copy of this Protective Order shall accompany any copy made of the discovered  
8 materials. Parties who have signed this Stipulated Protective Order acknowledge that  
9 he/she has read the order and understands the provisions of the order and agree in  
10 writing to abide by its terms. Each person to whom disclosure is made, prior to the time  
11 of disclosure, shall be provided by the person providing the documents, a copy of this  
12 Protective Order, and shall agree in writing that he/she has read and understands this  
13 Protective Order.

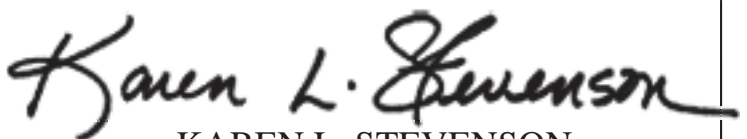
14 7. At the conclusion of this matter, all discovered materials or copies of such  
15 materials shall be destroyed or returned to the California Department of Corrections and  
16 Rehabilitation, regardless of the outcome of the case. All such materials or copies of  
17 such materials shall be delivered to the Court if directed. If said documents, or copies  
18 thereof are destroyed, notification of their destruction is to be given to CDCR by counsel  
19 for Andrew Wilson.

20 8. Any violation of this order ~~shall~~ **may** result in sanctions by this Court, including  
21 contempt, and may be punishable by state or federal law.

22 9. This Order shall be continuing in nature, and shall apply whether the case is  
23 pending before a trial or appellate court.

24 **IT IS SO ORDERED**

25  
26 DATED: April 19, 2019



KAREN L. STEVENSON  
UNITED STATES MAGISTRATE JUDGE